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April 21, 2025

**VIA ELECTRONIC FILING**

Hon. Brenda K. Sannes, Chief U.S. District Judge  
James M. Hanley Federal Building  
100 S Clinton Street  
Syracuse, New York 13261

Re: *Maddox v. Francemone*, Civil Case No.: 5:19-CV-00678 (BKS/MJK)

Dear Chief Judge Sannes,

In accordance with Text Order 451, the parties respectfully submit the annexed joint brief synopsis of Plaintiff's claim and Defendant's defense, to be read to the jury prior to *voir dire*.

As reflected in the second paragraph, the parties have a disagreement regarding some of the proposed language. Specifically, Attorney Lichtmacher has requested that the synopsis include a reference to Mr. Porter's children and omit language addressing Plaintiff's burden of proof. Accordingly, the portion highlighted in yellow reflects the version that Attorney Lichtmacher proposes be read to the jury.

We appreciate the Court's time and attention to this matter.

Very truly yours,

HANCOCK ESTABROOK, LLP

A handwritten signature in black ink, appearing to read 'Mary D'Agostino', is written over a circular stamp or seal.

Mary L. D'Agostino

MLD/